



**RIKER  
DANZIG  
SCHERER  
HYLAND  
PERRETTI<sup>LLP</sup>**

ATTORNEYS AT LAW

**Marilynn R. Greenberg**  
Partner

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mgreenberg@riker.com  
Reply to: Morristown

January 25, 2007

**VIA CERTIFIED MAIL/R.R.R.**

Michael J. van Itallie  
Office of Regional Counsel  
U.S. Environmental Protection Agency, Region II  
290 Broadway, 17<sup>th</sup> Floor  
New York, NY 10007-1866

Re: Pioneer Smelting Site Request for Information

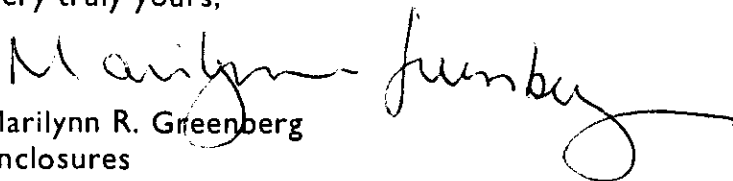
Dear Mr. Itallie:

We are in receipt of your letter dated December 22, 2006 which you sent to G-I Holdings/GAF Corporation with respect to the above-referenced site. We represent G-I Holdings, Inc. ("G-I"), which is the successor by merger to GAF, in connection with its bankruptcy proceeding, details of which are provided below.

As you may already know, G-I filed a voluntary petition for reorganization under Chapter 11 of the Bankruptcy Code (11 U.S.C.A. §§101 et seq.) in the United States Bankruptcy Court for the District of New Jersey (the "Bankruptcy Court") on January 5, 2001. (A copy of the Voluntary Petition and Amended Voluntary Petition is enclosed for your records). As a result of the bankruptcy filing, any claims such as those for past response costs must be presented to the Bankruptcy Court. In addition, any suit to collect any amounts you claim are due from G-I, as a successor to GAF, is stayed pursuant to § 362(a)(1) of the Bankruptcy Code. Notwithstanding, G-I will be responding to the request for information.

Should you have any questions, please feel free to contact me or Alex Kress of this firm.

Very truly yours,

  
Marilynn R. Greenberg  
Enclosures

cc: Marissa Truono  
Removal Action Branch  
U.S. Environmental Protection Agency, Region II  
2890 Woodbridge Avenue, Bldg 209  
Edison, New Jersey 08837

JAN 29 2007

I hereby certify that the foregoing  
is a TRUE COPY of the original  
file in the office of the Clerk of  
the United States Bankruptcy Court.

<b>FORM B1</b>		<b>United States Bankruptcy Court</b> <b>District of New Jersey</b>		<b>Deputy</b>		<b>VOLUNTARY PETITION</b>	
Name of Debtor (if individual, enter Last, First, Middle): G-I Holdings Inc.				Name of Joint Debtor (Spouse) (Last, First, Middle):			
All Other Names used by the Debtor in the last 6 years (include married, maiden, and trade names): N/A				All Other Names used by the Joint Debtor in the last 6 years (include married, maiden, and trade names):			
Soc. Sec./Tax I.D. No. (if more than one, state all): Tax I.D. No. 13-3483838				Soc. Sec./Tax I.D. No. (if more than one, state all):			
Street Address of Debtor (No. & Street, City, State & Zip Code): 1361 Alps Road Wayne, NJ 07470				Street Address of Joint Debtor (No. & Street, City, State & Zip Code):			
County of Residence or of the Principal Place of Business: Passaic				County of Residence or of the Principal Place of Business:			
Mailing Address of Debtor (if different from street address):				Mailing Address of Joint Debtor (if different from street address):			
Location of Principal Assets of Business Debtor (if different from street address above):							

### INFORMATION REGARDING DEBTOR (Check applicable boxes)

#### Venue (Check any applicable box)

- ☒ Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
- ☐ There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

#### Type of Debtor (Check all boxes that apply)

- ☐ Individual(s)
- ☒ Corporation
- ☐ Partnership
- ☐ Other \_\_\_\_\_
- ☐ Railroad
- ☐ Stockbroker
- ☐ Commodity Broker

#### Chapter or Section of Bankruptcy Code Under Which the Petition is Filed (Check one box)

- ☐ Chapter 7
- ☐ Chapter 9
- ☐ Sec. 304 - Case ancillary to foreign proceeding
- ☒ Chapter 11
- ☐ Chapter 12
- ☐ Chapter 13

#### Nature of Debts

- ☐ Consumer/Non-Business
- ☒ Business

#### Chapter 11 Small Business (Check all boxes that apply)

- ☐ Debtor is a small business as defined in 11 U.S.C. § 101
- ☐ Debtor is and elects to be considered a small business under 11 U.S.C. § 1121(c) (Optional)

#### Filing Fee (Check one box)

- ☒ Full Filing Fee attached
- ☐ Filing Fee to be paid in installments (Applicable to individuals only)  
Must attach signed application for the court's consideration  
certifying that the debtor is unable to pay fee except in installments.  
Rule 1006(b). See Official Form No. 3.

#### Statistical/Administrative Information (Estimates on)

- ☒ Debtor estimates that funds will be available for distribution
- ☐ Debtor estimates that, after any exempt property there will be no funds available for distribution

#### Estimated Number of Creditors

1-15 ☐ 16-49 ☐

#### Estimated Assets

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

#### Estimated Debts

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

### UNITED STATES BANKRUPTCY COURT DISTRICT OF NEW JERSEY

Case # 01-30135 nRG

Chapter 11

Filed: 12:05 PM, 01/05/01

Newark

Judge: Rosemary Gambardella

Trustee:

Debtor(s):  
G-I Holdings Inc.

#### First Meeting of Creditors

09:00 AM, January 31, 2001

One Newark Center

One Newark Center

Suite 1401, Office of the US Trustee  
Newark, NJ 07102-5504

RECEIPT

# 000222424 - TT

12:14 PM, January 05, 2001

Code	Qty	Amount
NF	1	\$30.00
11	1	\$800.00

ORIGINAL

TOTAL PAID: \$830.00

From: Dennis J. O'Grady  
One Speedwell Ave, HQ Plaza  
PO Box 1981  
Morristown, NJ 07962-1981

<b>Voluntary Petition</b> (This page must be completed and filed in every case)		Name of Debtor(s): G-I Holdings Inc.	
<b>Prior Bankruptcy Case Filed Within Last 6 Years (If more than one, attach additional sheet)</b>			
Location: Where Filed:		Case Number:	
Date Filed:		<b>Pending Bankruptcy Case Filed by any Spouse, Partner or Affiliate of this Debtor (If more than one, attach additional sheet)</b>	
Name of Debtor:		Case Number:	
District:		Relationship:	
Date Filed:		Judge:	

SIGNATURES	
<b>Signature(s) of Debtor(s) (Individual/Joint)</b>  I declare under penalty of perjury that the information provided in this petition is true and correct. [If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7. I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.  X _____ Signature of Debtor  X _____ Signature of Joint Debtor  X _____ Telephone Number (if not represented by attorney)  _____ Date	<b>Signature of Debtor (Corporation/Partnership)</b>  I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.  The debtor requests relief in accordance with the chapter of title 11, United States Code, specified in this petition.  _____ Signature of Authorized Individual Richard A. Weinberg Printed Name of Authorized Individual President and Chief Executive Officer Title of Authorized Individual January, 2001 Date
<b>Signature of Attorney</b> Martin J. Bienenstock Printed Name of Attorney for Debtor(s) X _____ Signature of Attorney for Debtor(s)  Martin J. Bienenstock, Esq. Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 Telephone: (212) 310-8000  Dennis J. O'Grady, Esq. Riker, Danzig, Scherer, Hyland & Perretti LLP Headquarters Plaza One Speedwell Avenue Morristown, NJ 07962 Telephone: (973) 538-0800  Date January, 2001.	<b>Signature of Non-Attorney Petition Preparer</b>  I certify that I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110, that I prepared this document for compensation, and that I have provided the debtor with a copy of this document.  _____ Printed Name of Bankruptcy Petition Preparer  _____ Social Security Number  _____ Address  Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document:  If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.  X _____ Signature of Bankruptcy Petition Preparer  _____ Date  A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. § 110; 18 U.S.C. § 156.
<b>Exhibit A</b>  (To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11)  <input type="checkbox"/> Exhibit A is attached and made a part of this petition.	
<b>Exhibit B</b>  (To be completed if debtor is an individual whose debts are primarily consumer debts)  I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter.  X _____ Signature of Attorney for Debtor(s)      Date	

<b>FORM B1</b>	<b>United States Bankruptcy Court District of New Jersey</b>	<b>AMENDED VOLUNTARY PETITION</b>
Name of Debtor (if individual, enter Last, First, Middle): G-I Holdings Inc. (f/k/a/ GAF Corporation)		Name of Joint Debtor (Spouse) (Last, First, Middle):
All Other Names used by the Debtor in the last 6 years (include married, maiden, and trade names): (See Attached)		All Other Names used by the Joint Debtor in the last 6 years (include married, maiden, and trade names):
Soc. Sec./Tax I.D. No. (if more than one, state all): Tax I.D. No. 22-2934562		Soc. Sec./Tax I.D. No. (if more than one, state all):
Street Address of Debtor (No. & Street, City, State & Zip Code): 1361 Alps Road Wayne, NJ 07470		Street Address of Joint Debtor (No. & Street, City, State & Zip Code):
County of Residence or of the Principal Place of Business: Passaic		County of Residence or of the Principal Place of Business:
Mailing Address of Debtor (if different from street address):		Mailing Address of Joint Debtor (if different from street address):
Location of Principal Assets of Business Debtor (if different from street address above):		

**INFORMATION REGARDING DEBTOR (Check applicable boxes)****Venue (Check any applicable box)**

- ☒ Debtor has been domiciled or has had a residence, principal place of business, or principal assets in this District for 180 days immediately preceding the date of this petition or for a longer part of such 180 days than in any other District.
- ☐ There is a bankruptcy case concerning debtor's affiliate, general partner, or partnership pending in this District.

**Type of Debtor (Check all boxes that apply)**

- ☐ Individual(s) ☐ Railroad
- ☒ Corporation ☐ Stockbroker
- ☐ Partnership ☐ Commodity Broker
- ☐ Other \_\_\_\_\_

**Chapter or Section of Bankruptcy Code Under Which  
the Petition is Filed (Check one box)**

- ☐ Chapter 7 ☒ Chapter 11 ☐ Chapter 13
- ☐ Chapter 9 ☐ Chapter 12
- ☐ Sec. 304 - Case ancillary to foreign proceeding

**Nature of Debts**

- ☐ Consumer/Non-Business ☒ Business

**Filing Fee (Check one box)**

- ☒ Full Filing Fee attached
- ☐ Filing Fee to be paid in installments (Applicable to individuals only)  
Must attach signed application for the court's consideration  
certifying that the debtor is unable to pay fee except in installments.  
Rule 1006(b). See Official Form No. 3.

**Chapter 11 Small Business (Check all boxes that apply)**

- ☐ Debtor is a small business as defined in 11 U.S.C. § 101
- ☐ Debtor is and elects to be considered a small business under 11 U.S.C. § 1121(e) (Optional)

**Statistical/Administrative Information (Estimates only)**

- ☒ Debtor estimates that funds will be available for distribution to unsecured creditors.
- ☐ Debtor estimates that, after any exempt property is excluded and administrative expenses paid, there will be no funds available for distribution to unsecured creditors.

**Estimated Number of Creditors**

1-15	16-49	50-99	100-199	200-999
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Estimated Assets**

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million	\$50,000,001 to \$100 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Estimated Debts**

\$0 to \$50,000	\$50,001 to \$100,000	\$100,001 to \$500,000	\$500,001 to \$1 million	\$1,000,001 to \$10 million	\$10,000,001 to \$50 million	\$50,000,001 to \$100 million	More than \$100 million
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>

THIS SPACE IS FOR COURT USE ONLY

**FILED**  
**JAMES I. WALDRON**  
**2001**  
**U.S. BANKRUPTCY COURT**  
**NEWARK, NJ**  
**DEPUTY**

<b>Voluntary Petition</b> (This page must be completed and filed in every case)		Name of Debtor(s): G-I Holdings Inc.		<b>FORM B1, Page 2</b>
<b>Prior Bankruptcy Case Filed Within Last 6 Years (If more than one, attach additional sheet)</b>				
Location: Where Filed:		Case Number:		Date Filed:
<b>Pending Bankruptcy Case Filed by any Spouse, Partner or Affiliate of this Debtor (If more than one, attach additional sheet)</b>				
Name of Debtor:		Case Number:		Date Filed:
District:		Relationship:		Judge:
<b>SIGNATURES</b>				
<b>Signature(s) of Debtor(s) (Individual/Joint)</b>  I declare under penalty of perjury that the information provided in this petition is true and correct. [If petitioner is an individual whose debts are primarily consumer debts and has chosen to file under chapter 7] I am aware that I may proceed under chapter 7, 11, 12 or 13 of title 11, United States Code, understand the relief available under each such chapter, and choose to proceed under chapter 7. I request relief in accordance with the chapter of title 11, United States Code, specified in this petition.  <input checked="" type="checkbox"/> _____ Signature of Debtor  <input checked="" type="checkbox"/> _____ Signature of Joint Debtor  <input checked="" type="checkbox"/> _____ Telephone Number (If not represented by attorney)  _____ Date		<b>Signature of Debtor (Corporation/Partnership)</b>  I declare under penalty of perjury that the information provided in this petition is true and correct, and that I have been authorized to file this petition on behalf of the debtor.  The debtor requests relief in accordance with the chapter of title 11, United States Code specified in this petition.  _____ Signature of Authorized Individual Richard A. Weinberg Printed Name of Authorized Individual President and Chief Executive Officer Title of Authorized Individual January 8, 2001 Date		
<b>Signature of Attorney</b>  Martin J. Bienenstock      Warren J. Martin Jr. Printed Name of Attorney for Debtor(s) <input checked="" type="checkbox"/> _____ Signature of Attorney for Debtor(s)  Martin J. Bienenstock, Esq. Weil, Gotshal & Manges LLP 767 Fifth Avenue New York, NY 10153 Telephone: (212) 310-8000  Dennis J. O'Grady, Esq. Warren J. Martin Jr. Riker, Danzig, Scherer, Hyland & Peretti LLP Headquarters Plaza One Speedwell Avenue Morristown, NJ 07962 Telephone: (973) 538-0800  Date January 8, 2001.		<b>Signature of Non-Attorney Petition Preparer</b>  I certify that I am a bankruptcy petition preparer as defined in 11 U.S.C. § 110, that I prepared this document for compensation, and that I have provided the debtor with a copy of this document.  _____ Printed Name of Bankruptcy Petition Preparer  _____ Social Security Number  _____ Address  Names and Social Security numbers of all other individuals who prepared or assisted in preparing this document:		
<b>Exhibit A</b>  (To be completed if debtor is required to file periodic reports (e.g., forms 10K and 10Q) with the Securities and Exchange Commission pursuant to Section 13 or 15(d) of the Securities Exchange Act of 1934 and is requesting relief under chapter 11)  <input type="checkbox"/> Exhibit A is attached and made a part of this petition.		If more than one person prepared this document, attach additional sheets conforming to the appropriate official form for each person.  <input checked="" type="checkbox"/> _____ Signature of Bankruptcy Petition Preparer  _____ Date		
<b>Exhibit B</b>  (To be completed if debtor is an individual whose debts are primarily consumer debts)  I, the attorney for the petitioner named in the foregoing petition, declare that I have informed the petitioner that [he or she] may proceed under chapter 7, 11, 12, or 13 of title 11, United States Code, and have explained the relief available under each such chapter.  <input checked="" type="checkbox"/> _____ Signature of Attorney for Debtor(s)      Date		A bankruptcy petition preparer's failure to comply with the provisions of title 11 and the Federal Rules of Bankruptcy Procedure may result in fines or imprisonment or both. 11 U.S.C. § 110; 18 U.S.C. § 156.		

**All Other Names used by the Debtor in the last 6 years**

GAF Corporation  
GAF Building Materials Corporation  
G Industries Corporation  
GAF Fiberglass Corporation